

## DEPARTMENT OF HEALTH SERVICES

## TOXIC SUBSTANCES CONTROL DIVISION (REGION 3)

1405 N. SAN FERNANDO BOULEVARD, SUITE 300  
BURBANK, CA 91504



JAN 2 1990

Mr. Glen Abdun Nur  
Bermite Division, Whittaker Corp.  
22116 West Soledad Canyon Road  
Santa Clarita, CA 91350

Dear Mr. Abdun Nur:

CLEAN CLOSURE CERTIFICATION ACKNOWLEDGEMENT - STORAGE BUILDINGS  
223 AND 236, AND LEAD AZIDE TREATMENT AREA AT WHITTAKER  
CORPORATION, BERMITE DIVISION, SANTA CLARITA, CA. EPA ID.  
#CAD064573108

The Department of Health Services (DHS) and the U.S. Environmental Protection Agency (EPA) have received the owner's and engineer's revised certification dated October 24, 1989, that a portion of your facility has been closed in accordance with the approved closure plan. This letter is to inform you that the Department now considers the above-referenced hazardous waste management units officially closed.

Pursuant to section 67013 of Title 22, Division 4, Chapter 30 of the California Code of Regulations and 40 CFR 265.143(h), Whittaker is released from the requirement to maintain financial assurance for closure of the above-referenced units.

This acknowledgment and release is for the above-referenced units only and is based on the assumption that the information submitted in the certification as well as any information used as a basis for this decision is accurate. Any inaccuracies found in this information may be grounds for nullification of this clean closure certification and potential enforcement action. The Owner/Operator must inform the Department of any deviations from or changes in the information provided which would affect the clean closure certification for the above-referenced units.

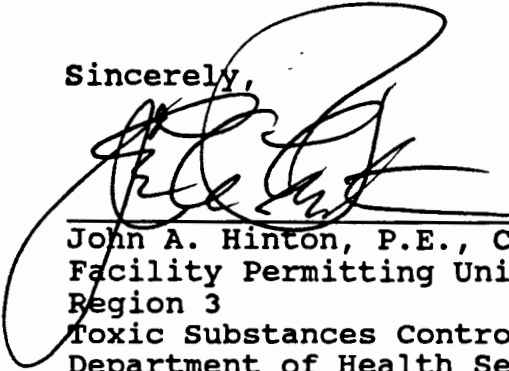
Please be advised that this acknowledgment of partial facility closure is not a certification that your facility does not pose any environmental or public health threat. This letter does not remove any liabilities associated with past hazardous waste management practices which occurred on the site.

Mr. Glen Abdun Nur

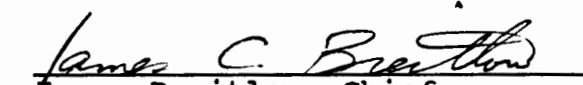
-2-

Should you have questions, please contact Alan Sorsher of the DHS Toxic Substances Control Program Region 3 office at (818) 567-3119.

Sincerely,



John A. Hinton, P.E., Chief  
Facility Permitting Unit  
Region 3  
Toxic Substances Control Program  
Department of Health Services



James Breitlow, Chief  
California Permits Section  
State Programs Branch  
Hazardous Waste Management Div.  
U.S. EPA, Region IX

12/20/89  
Date

28 Dec 89  
Date

cc: Norman Wenck  
Wenck Associates,  
832 Twelve Oaks Center  
15500 Wayzata Blvd.  
Wayzata, MN 55391

Anastacio Medina, LA County Haz. Waste Program  
2615 S. Grand Ave., 6th Floor  
Los Angeles, CA 90007

Jim Ross, RWQCB, Los Angeles  
101 Centre Plaza Drive  
Monterey Park, CA 91754-2156

Mr. Gordon Louttit  
Vice President  
Whittaker Corporation  
10880 Wilshire Boulevard  
Los Angeles, California 90024

David W. Hogan, Assistant Planner  
City of Santa Clarita  
23920 Valencia Blvd. Suite 300  
Santa Clarita, CA 91355

Mr. Glen Abdun Nur

-3-

Paul Blais  
Hazardous Waste Management Unit  
Toxic Substances Control Program  
714/744 P Street  
P.O. Box 924732  
Sacramento, CA 94234-7320

Lucille Van Omerring  
Financial Responsibility Unit  
Toxic Substances Control Program  
714/744 P Street  
P.O. Box 924732  
Sacramento, CA 94234-7320

Tom Kelly  
U.S. EPA, Region IX  
215 Fremont Street  
San Francisco, CA 94105

Mr. Al Simmons  
Whittaker Corporation  
P.O. Box 708  
Richardson, Texas 75080

NOV 28 1989

In Reply Refer To: H-3-2

M. Glen Abdun Nur  
Bermite Division, Whittaker Corp.  
22116 West Soledad Canyon Road  
Santa Clarita, CA 91350

Dear Mr. Abdun Nur:

Re: Clean Closure Acknowledgment - Storage Units E1, E2, E3,  
502, 504, 506, at Whittaker Corporation, Bermite Division,  
Santa Clarita, CA EPA ID. CAD064573108

EPA has received the owner's and engineer's certification that a portion of your facility has been closed in accordance with the approved closure plan. This letter is to inform you that EPA now considers the above-referenced hazardous waste management units officially closed.

Pursuant to Title 40 of the Code of Federal Regulations, Section 264.143, Whittaker is released from the requirement to maintain financial assurance for closure of the above-referenced units.

This acknowledgment and release is for the above-referenced units only and is based on the assumption that the information submitted in the certification as well as any information used as a basis for this decision is accurate. Any inaccuracies found in this information may be grounds for nullification of this clean closure certification and potential enforcement action. The Owner/Operator must inform the Department of any deviation from or changes in the information provided which would affect the clean closure certification for the above-referenced units.

Please be advised that this acknowledgment of partial facility closure is not a certification that your facility does not pose any environmental or public health threat. This letter does not remove any liabilities associated with past hazardous waste management practices which occurred on the site.

SYMBOL	H-3					
SURNAME	<i>[Signature]</i>					
DATE	<i>11/24/89</i>					
U.S. EPA	CONCURRENCES					OFFICIAL FILE COPY

If you have any questions regarding this matter, please contact Tom Kelly of this office at (415) 523-4416.

Sincerely,

*Original signed by*  
*James C. Brethlow*  
for Michael Feeley, Chief  
State Programs Branch

cc: Norman Wenk  
Wenck Associates,  
832 Twelve Oaks Center  
15500 Wayzata Blvd.  
Wayzata, MN 55319

Anastacio Medina  
LA County Haz. Waste Program  
2615 S. Grand Ave., 6th Floor  
Los Angeles, CA 90007

David W. Hogan, Assistant Planner  
City of Santa Clarita  
23920 Valencia Blvd. Suite 300  
Santa Clarita, CA 91355

Mr. Gordon Louttit  
Vice President  
Whittaker Corporation  
10880 Wilshire Boulevard  
Los Angeles, CA 90024

Paul Blais  
Hazardous Waste Management Unit  
Toxic Substances Control Program  
714/744 P. Street  
P.O. Box 924732  
Sacramento, CA 94234-7320

Mr. Al Simmons  
Whittaker Corporation P.O. Box 708  
Richardson, Texas 75080

Alan Sorsher  
Department of Health Services  
Toxic Substances Control Division Region 3  
1405 No. San Fernando Blvd. #300  
Burbank, CA 91504

## DEPARTMENT OF HEALTH SERVICES

## TOXIC SUBSTANCES CONTROL DIVISION (REGION 3)

1405 N. SAN FERNANDO BOULEVARD, SUITE 300

BURBANK, CA 91504



001 11 1989

Mr. Glen Abdun Nur  
Bermite Division, Whittaker Corp.  
22116 West Soledad Canyon Road  
Santa Clarita, CA 91350

Dear Mr. Abdun Nur:

CLEAN CLOSURE CERTIFICATION ACKNOWLEDGEMENT - STORAGE UNITS E1, E2, E3, 502, 504, 506, AT WHITTAKER CORPORATION, BERMITE DIVISION, SANTA CLARITA, CA. EPA ID. #CAD064573108

The Department of Health Services has received the owner's and engineer's certification that a portion of your facility has been closed in accordance with the approved closure plan. This letter is to inform you that the Department now considers the above-referenced hazardous waste management units officially closed.

Pursuant to section 67013 of Title 22, Division 4, Chapter 30 of the California Code of Regulations, Whittaker is released from the requirement to maintain financial assurance for closure of the above-referenced units.

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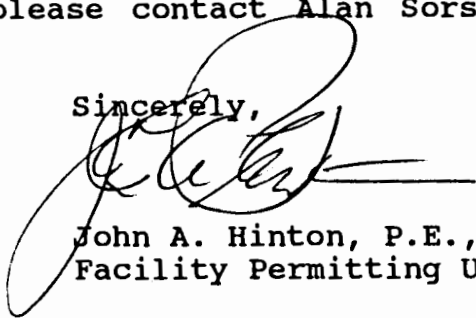
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Mr. Glen Abdun Nur

-2-

Should you have questions, please contact Alan Sorsher of this office at (818) 567-3119.

Sincerely,



John A. Hinton, P.E., Chief  
Facility Permitting Unit

cc: Norman Wenck  
Wenck Associates,  
832 Twelve Oaks Center  
15500 Wayzata Blvd.  
Wayzata, MN 55391

Anastacio Medina, LA County Haz. Waste Program  
2615 S. Grand Ave., 6th Floor  
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Financial Responsibility Unit  
Toxic Substances Control Program  
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P.O. Box 924732  
Sacramento, CA 94234-7320

Mr. Glen Abdun Nur

-3-

Jan Palumbo/Jim Breitlow  
U.S. EPA, Region IX  
215 Fremont Street  
San Francisco, CA 94105

Mr. Al Simmons  
Whittaker Corporation  
P.O. Box 708  
Richardson, Texas 75080



## DEPARTMENT OF HEALTH SERVICES

107 SOUTH BROADWAY  
LOS ANGELES, CALIFORNIA 90012

25 SEP 1987

Mr. Gordon Louttit  
Vice President  
Whittaker Corporation  
10880 Wilshire Boulevard  
Los Angeles, California 90024

Dear Mr. Louttit:

WHITTAKER CORPORATION, BERMITE DIVISION, SAUGUS, CA CAD064573108,  
FACILITY CLOSURE PLAN APPROVAL

The California Department of Health Services (DHS) and the Region IX office of the U.S. Environmental Protection Agency (EPA) have reviewed the Closure Plan dated August 1, 1986 with the subsequent revision dated April 1987 and the DHS/EPA modifications of September 1987 for the closure of hazardous waste management units at the Bermite facility located in Saugus, CA.

The units consist of two storage buildings, three steel portable magazines, three wooden portable magazines, a lead azide washwater treatment unit, two surface impoundments previously removed and thermal treatment units consisting of a detonation area, two former burn pits, and burning cage, pans and rails.

Pursuant to Title 22 of the California Administrative Code, and the regulations adopted pursuant to the Resource Conservation and Recovery Act, 42 USC 6901 et. seq., the Closure Plan as modified is determined to be acceptable and is hereby approved (copy enclosed) subject to the conditions of the attached Compliance Schedule. Also enclosed is a detailed statement of reasons for the modifications as per 40 CFR 265.112 (d)(4). You are required to comply with the specific steps of this approved Closure Plan.

Please note that upon completion of closure, you and a certified California registered professional engineer must certify that closure was conducted in accordance with this approved Plan. Copies of the certifications must be submitted to both DHS and the EPA. Documentation of closure activities as authorized at 40 CFR 265.115 shall accompany the closure certification. A sample "closure report" for this purpose has already been mailed to your consultant, Wenck Associates.

## CONCURRENCES

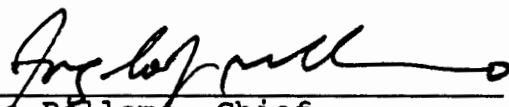
SYMBOL	T-2-2	T-2-2	T-2-2	Polyl				
SURNAME	Fernandez	Robinson	J. Brantley	Polyl				
DATE	9/26/87	9-28-87	9/30/87	9/30				

Mr. Gordon Louttit

-2-

Should you have questions regarding this approval, you may contact Alan Sorsher of the Southern California Section DHS at 213-620-2380

Sincerely,

  
\_\_\_\_\_  
Angelo Bellomo, Chief,  
Southern California Section,  
Toxic Substances Control Division,  
Department of Health Services

9-5-87  
Date

\_\_\_\_\_  
Jeff Zelikson, Acting Director  
Toxics & Waste Management Division  
U.S. EPA, Region IX

\_\_\_\_\_  
Date

Enclosure

cc: Wenck Associates  
Twelve Oaks Center  
15500 Wayzata Blvd.  
Wayzata, MN 55391

Caroline Cabias, Chief  
Department of Health Services  
Hazardous Waste Management Section  
Toxic Substances Control Division  
714/744 "P" Street  
P. O. Box 942732  
Sacramento, CA 94234-7320

b.c. Fernandez (T-2-2)  
Robinson (T-2-2)  
Schwinn (T-2-4)  
Springer (T-2-1)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

215 Fremont Street  
San Francisco, Ca. 94105

MEMORANDUM

DATE: September 25, 1987

SUBJECT: Whittaker Bermite Closure Plan Approval  
(EPA ID# CAD064573108)

FROM: Michael A. Fernandez, P.E. *MAF*  
Environmental Engineer  
California Facilities Management Section

TO: File

I have reviewed the Whittaker Corporation Bermite Division plan to close its hazardous waste management units in Saugus, California. The units include two surface impoundments, a lead azide washwater treatment unit, two storage buildings, six portable magazines, an open burning area, and an explosive detonation area. The units formerly managed wastes including spent solvents and explosives generated during the manufacture of ordnance products. The plan was originally submitted in August 1986. The plan was revised and submitted in April 1987. DHS published a public notice on August 7, 1987 initiating a 30 day comment period. A public hearing was held September 10, 1987. DHS prepared a responsiveness summary which addresses all written and oral comments.

The proposed closure plan requires site characterization, excavation of contaminated soils and a groundwater investigation. Demonstration of cleanup of both groundwater and soil to EPA health based standards is also necessary for the O/O to avoid post-closure care and monitoring requirements. Sampling strategies to establish existing contaminant levels and background levels for hazardous constituents have been specified in the plan.

I reviewed the closure plan using the attached EPA checklist. Comparison of the closure plan with the checklist enabled me to determine areas of concern and deficiencies which have been corrected by modifying the closure plan. Most of the modifications were made by DHS permit writer Alan Sorsher. All of the modifications have been discussed at great length and agreed upon by both EPA and DHS. The areas of concern and deficiencies are as follows:

- 1) The closure plan did not provide a satisfactory method for determining background levels for groundwater and soil contaminants. The area chosen for background sampling was not unaffected by waste management activities.

The closure plan has been modified to require background sampling in an area unaffected by waste management activities.

- 2) Site characterization methods as set forth in the closure plan are not appropriate. Sampling locations are not randomly selected and thus may provide erroneously low data for contaminant levels.

The closure plan has been modified to include a method for randomly selecting sampling locations.

- 3) Although the facility is attempting to clean close, this may not be possible. The closure plan does not include an adequate description of measures to be taken if clean closure cannot be accomplished.

The closure plan has been modified to state that, in the event the facility determines that clean closure cannot be accomplished, the facility will submit a cap design and interim status post-closure plan within 60 days of the determination and will implement interim status post-closure care and monitoring requirements.

- 4) The closure plan does not include a satisfactory groundwater investigation plan to determine if groundwater has been contaminated by waste management activities.

The closure plan has been modified to require an in depth evaluation of groundwater quality in order to determine if activities at the site have caused groundwater contamination.

- 5) The closure plan did not provide an adequate QA/QC plan for sampling and analytical activities.

The closure plan has been modified to include adequate QA/QC provisions.

During the entire review process Alan Sorsher was extremely cooperative, conscientious and well-organized. Sorsher noted numerous deficiencies in the closure plan and worked diligently to modify the closure plan in time to meet the September 30, 1987 approval deadline. This required extensive research and individual effort. Sorsher also showed creativity and resourcefulness in consulting with DHS groundwater and soil experts in order to address site characterization questions. All activities related to the closure plan review were well coordinated.

During the review process Sorsher did note organizational problems which he felt impaired his ability to do his job well. Sorsher felt he was not able to master a particular type of project (i.e., closure of surface impoundments) due to his being shifted from one site or project to another without regard for the type of expertise required for each project. As a result, permit writers are unable to develop sufficient expertise to complete their assignments as thoroughly and competently as would otherwise be possible.

I recommend approval of this closure plan.

265 TECHNICAL CLOSURE OVERVIEW CHECKLIST

- 1) Is there a schedule for closure? Yes
- (optional) Is waste removed within 90 days? yes ☒ no ☐  
If no, is there a justification and approval?  
Waste has already been removed. April 1987 CP has a schedule for characterization activities only.
- (optional) August 1986 CP has a more detailed schedule of activities  
Is the closure completed in 180 days? yes ☐ no ☒  
If no, is there a justification and approval?  
Assessment and remediation activities will probably require more than 180 days.
- (optional) Is the estimated year of closure identified? yes ☐ no ☒
- 2) Is the maximum inventory of waste stated in the plan? yes ☐ no ☒
- 3) Is there a detailed procedure for decontamination of each piece of equipment? yes ☒ no ☐  
If no, describe the deficiencies in the procedures.
- Are there adequate procedures to collect, treat and/or dispose of wastewater generated during decontamination?  
yes ☒ no ☐ If no describe the deficient procedures.
- 4) Are all hazardous wastes used and handled on-site identified (EPA ID #) in the plan? yes ☐ no ☒  
This is not known with great certainty.  
Are the chemicals and tests chosen appropriate for analysis (EPA method or equivalent)? yes ☒ no ☐  
If no, describe the deficient methods.
- Does the sampling plan address proper sample numbers, locations, equipment, etc.? yes ☐ no ☒  
If no, describe the deficient procedures.  
The sampling plan was not unbiased.
- Does the plan address QA/QC procedures? yes ☒ no ☐  
If no, describe the deficient procedures.  
More detailed QA/QC procedures are needed.

5) Specific Unit Closures

attach page for each unit

6) Is ground water monitoring required? yes ☒ no ☐

Is there a detailed description of the geohydrology?  
yes ☐ no ☒ If no, describe the deficiencies.

No GWM system currently exists.

Has the ground water system been evaluated? yes ☐ no ☒  
Describe adequacy of the evaluation

Has the ground water been tested to insure no contamination  
at clean closures? yes ☐ no ☒

7) Is there a closure cost estimate? yes ☒ no ☐

(optional) If yes, are the costs reasonable (spot check costs)?  
yes ☐ no ☒

(optional) Are the costs evaluated using the maximum inventory and  
contamination figures? yes ☐ no ☒

(optional) Is there a contingency cost percentage as a safety factor?  
yes ☐ no ☒

(optional) If yes, is it a reasonable number? yes ☐ no ☐ N/A

8) Is there an appropriate financial mechanism? yes ☐ no ☒

(optional) Does the mechanism cover the cost listed in the cost estimate?  
yes ☐ no ☒

9) Is there at least a generic statement in the plan  
addressing compliance with interim status post closure  
requirements prior to issuance of a post closure permit?  
yes ☐ no ☒



SURFACE IMPOUNDMENTS (Clean Closure)

rating of this section of the document

1	2	3	4	5
unsatisfactory		satisfactory		excellent

In evaluating this section of the review, consider the following questions:

No - Is there enough detail in the plan to determine if a proper closure was performed?

No - Were sound technical/engineering judgements made?

No - Was the sampling plan adequate (e.g., were proper chemical tests used, adequate QA/QA procedures etc.)

Yes - Did the review adhere to current guidance?

Not known - Have all hazardous waste and hazardous waste residues, liners, drainage, and contaminated soils been removed, or decontaminated?

To be determined - If a clean closure is claimed, do they meet § 261.3 (c) and § 261 (d)?

response: Modifications of the plan were necessary  
for it to meet regulatory requirements



## TANKS

rating of this section of the document

1

2

3

4

5

unsatisfactory

satisfactory

excellent

In evaluating this section of the review, consider the following questions:

Yes - Is there enough detail in the plan to determine if a proper closure was performed?

Yes - Were sound technical/engineering judgements made?

Yes - Was the sampling plan adequate (e.g., were proper chemical tests used, adequate QA/QA procedures etc.)

Yes - Did the review adhere to current guidance?

Yes - Have all hazardous waste and hazardous waste residues been removed from tanks, associated piping, discharge control, equipment, and confinement structures?

response: Additional work has been required in  
the modifications to the plan.

**CONTAINERS** (optional)

rating of this section of the document

1	2	3	4	5
unsatisfactory		satisfactory		excellent

In evaluating this section of the review, consider the following questions:

- Yes - Is there enough detail in the plan to determine if a proper closure was performed?
- Yes - Were sound technical/engineering judgements made?
- No - Was the sampling plan adequate (e.g., were proper chemical tests used, adequate QA/QA procedures etc.)
- Yes - Did the review adhere to current guidance?
- Yes\* - Have all hazardous wastes and hazardous waste residues been removed from the containment system?
- No - Have all containers, liners, bases, and soil been decontaminated or removed?
- Yes - Has all hazardous waste been properly handled?

response: \* Results of wipe samples will indicate  
if residues remain.

**265 EPA CLOSURE OVERSIGHT CHECKLIST** (Use this page for reviews of State actions on past closures.)

Facility Name Whittaker Corporation Benite Division

EPA ID # CAD 064573108

Is there an written plan? yes ☒ no ☐ date\* 4/87

Is the plan approved? yes ☒ no ☐ date\* 9/30/87

STATE CONTACT Alan Sarker

TITLE Associate Westmanagement Engineer

UNITS	REVIEWED BY EPA		DATE
tanks.....	yes <input checked="" type="checkbox"/>	no <input type="checkbox"/>	<u>8/87</u>
containers.....	yes <input checked="" type="checkbox"/>	no <input type="checkbox"/>	<u>8/87</u>
surface impoundments.	yes <input checked="" type="checkbox"/>	no <input type="checkbox"/>	<u>8/87</u>
landfills.....	yes <input type="checkbox"/>	no <input checked="" type="checkbox"/>	
incinerators.....	yes <input type="checkbox"/>	no <input checked="" type="checkbox"/>	
waste piles.....	yes <input type="checkbox"/>	no <input checked="" type="checkbox"/>	

EPA REVIEWER Michael A. Fernandez

Comments or Summary

\*state if date of plan received, plan approved, or closure requested etc.

## DEPARTMENT OF HEALTH SERVICES

107 SOUTH BROADWAY  
LOS ANGELES, CALIFORNIA 90012



Mr. Gordon Louttit  
Vice President  
Whittaker Corporation  
10880 Wilshire Boulevard  
Los Angeles, California 90024

Dear Mr. Louttit:

WHITTAKER CORPORATION, BERMITE DIVISION, SAUGUS, CA CAD064573108,  
FACILITY CLOSURE PLAN APPROVAL

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Pursuant to Title 22 of the California Administrative Code, and the regulations adopted pursuant to the Resource Conservation and Recovery Act, 42 USC 6901 et. seq., the Closure Plan as modified is determined to be acceptable and is hereby approved (copy enclosed) subject to the conditions of the attached Compliance Schedule. Also enclosed is a detailed statement of reasons for the modifications as per 40 CFR 265.112 (d)(4). You are required to comply with the specific steps of this approved Closure Plan.

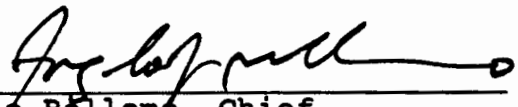
Please note that upon completion of closure, you and a certified California registered professional engineer must certify that closure was conducted in accordance with this approved Plan. Copies of the certifications must be submitted to both DHS and the EPA. Documentation of closure activities as authorized at 40 CFR 265.115 shall accompany the closure certification. A sample "closure report" for this purpose has already been mailed to your consultant, Wenck Associates.

Mr. Gordon Louttit

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Should you have questions regarding this approval, you may contact Alan Sorsher of the Southern California Section DHS at 213-620-2380

Sincerely,

  
\_\_\_\_\_  
Angelo Bellomo, Chief,  
Southern California Section,  
Toxic Substances Control Division,  
Department of Health Services

9-15-87  
Date

Original Signed By:

\_\_\_\_\_  
Jeff Zelikson, Acting Director  
Toxics & Waste Management Division  
U.S. EPA, Region IX

9-15-87  
Date

Enclosure

cc: Wenck Associates  
Twelve Oaks Center  
15500 Wayzata Blvd.  
Wayzata, MN 55391

Caroline Cabis, Chief  
Department of Health Services  
Hazardous Waste Management Section  
Toxic Substances Control Division  
714/744 "P" Street  
P. O. Box 942732  
Sacramento, CA 94234-7320

WHITTAKER CORPORATION, BERMITE DIVISION  
CAD 064 573 108

REASONS FOR CLOSURE PLAN MODIFICATION

1. Hazardous waste management units undergoing closure must verify that they are not sources of groundwater contamination by performing groundwater monitoring.
  - The hydrogeologic assessment required by the August 1986 consent agreement and the March 3, 1987 Notice of Deficiencies has not been completed and the proposal in the revised closure plan is not sufficient to characterize the hydrogeology of the site.
  - No rationale has been provided as to why 300 feet was chosen as the depth to stop drilling.
  - The lab results for the soil physical characteristics resulting from exploratory borings in June and July of 1987 have still not been received and no reason has been given for the delay.
  - No information has been provided as to how Bermite proposes to characterize the uppermost aquifer, such as pump or slug tests to establish hydraulic conductivity.
  - The plan submitted did not explain the conditions under which wells installed for characterization purposes would be used as routine monitoring wells. The plan assumed that the characterization wells would be fortuitously placed and constructed and that additional wells would not be required.
  - Although Bermite has executed the hydrogeologic assessment plan, without Agency approval and at their own risk, the uppermost aquifer is still not characterized, indicating that additional efforts are needed.
2. Soil sampling for metals and other constituents lacked a sampling plan developed in accordance with SW-846. For example the sampling for metals at the impoundments appear to be incidental to the sampling for solvents and soil physical parameters.
  - A statistically sound background study was not proposed or performed, nor was a rationale for its omission provided with the plan.
3. Although page IV-30 of the submitted plan is entitled "QA/QC PLAN", the section is really part of the description of the drilling and sampling procedures discussed elsewhere in the plan and does not focus on the extra QA/QC sampling described in the guidance documents.

30 SEP 1987

Mr. Gordon Louttit  
Vice President  
Whittaker Corporation  
10980 Wilshire Boulevard  
Los Angeles, California 90024

Dear Mr. Louttit:

The attached modified closure plan for the Bermite facility does not constitute a requirement for clean closure by removal of hazardous constituents to background levels. Should the facility determine that closure by such removal is not feasible then a post-closure plan would be submitted for review and approval by the agencies pursuant to Condition 4 in the Compliance Schedule. The term "cap" referenced in Condition 4 is not necessarily a full RCRA cap.

We appreciated meeting with you and other company representatives on September 28 and 30.

Sincerely,

ORIGINAL SIGNED BY:

Jeff Zelikson, Director  
Toxics and Waste Management  
Division



## DEPARTMENT OF HEALTH SERVICES

107 SOUTH BROADWAY  
LOS ANGELES, CALIFORNIA 90012



September 25, 1987

Mr. James Breitlow  
U.S. EPA, Region IX  
215 Fremont Street  
San Francisco, CA 94105

Dear Mr. Breitlow:

WHITTAKER CORPORATION, BERMITE DIVISION, SAUGUS, CA CAD064573108,  
FACILITY CLOSURE PLAN APPROVAL

The Bermite Division of Whittaker Corporation operated an ordnance manufacturing facility at their Saugus, California location from the mid-1960's until late 1986. The property was used for similar purposes since the early 1900's.

The regulated hazardous waste management units consist of two storage buildings, three steel portable magazines, three wooden portable magazines, a lead azide washwater treatment unit, two surface impoundments (previously removed) and thermal treatment units consisting of a detonation area, a burning cage, burning pans and rails and two former burn pits.

The proposed Closure Plan, as modified, requires removal of volatile organics from the area of one of the former impoundments as well as verification monitoring of groundwater; plus sampling and removal of possible heavy metals or other hazardous constituents from the existing units and soils.

An advertisement soliciting interested public was published in the local paper on July 31 and August 2, 1987. About 20 people expressed interest in the facility.

The public notice of the Closure Plan was published on August 7, 1987 and the public comment period was closed on September 10, 1987, the same day that a joint public hearing on this facility was held.

No written or oral comments on the plan were received, but eight questions about the closure plan were discussed during the question and answer portion of the hearing. Other questions pertained to general past facility practices which are to be addressed in the HSWA RFA process.

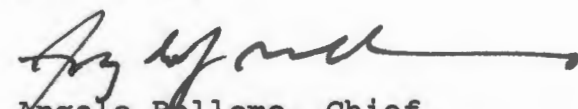


Mr. James Breitlow

-2-

We have reviewed the plan and recommend EPA's approval in accordance with our Reversion Agreement for the RCRA program. Enclosed with this letter is a joint approval letter signed and dated by myself for co-signature by Jeff Zelikson. Please transmit the fully signed copy to Mr. Louttit and forward copies as indicated.

Sincerely,



Angelo Bellomo, Chief,  
Southern California Section,  
Toxic Substances Control Division,  
Department of Health Services

Enclosure

cc: Caroline Cabras, Chief  
Department of Health Services  
Hazardous Waste Management Section  
Toxic Substances Control Division  
714/744 "P" Street  
P.O. Box 942732  
Sacramento, CA 942732-7320

John Adams  
California Water Resource Control Board  
P. O. Box 100  
Sacramento, CA 94801

Larry Peterson  
Regional Water Quality Control Board  
Los Angeles Region  
107 South Broadway, Room 4027  
Los Angeles, CA 90012

CLOSURE CHRONOLOGY

WHITTAKER CORPORATION, BERMITE DIVISION  
CAD 064 573 108

<u>DATE</u>	<u>ITEM</u>
March, 1983	Bermite removes two surface impoundments (units 317 & 342) without approved closure plan.
August 15, 1983 - November 30, 1983	Three letters from Bermite to DHS describing removal of impoundments and analysis of limited subsoil sampling.
October 28, 1985	DHS sends NOD on surface impoundment closures.
November 20, 1985	Letter from Bermite to DHS in response to above NOD.
April 28, 1986	Letter from DHS to EPA Enforcement re: inadequate closure of 317 impoundment
June - July, 1986	Bermite's consultant takes soil samples from site of former 317 impoundment. Sampling plan was not approved by EPA or DHS.
August 1, 1986	Consultant submits amended closure plan in anticipation of consent agreement with EPA.
August 19, 1986	Bermite submits sampling plan and results of June/July sampling at former 317 impoundment site.
August 26, 1986	EPA consent agreement signed requiring: submittal of closure plan; additional closure sampling at site of former #317 surface impoundment demonstrating compliance with 40 CFR 265.228; engineer's certification of closure for 317 & 342 impoundments and lead azide tank system.
October 22, 1986	Bermite's consultant takes soil samples from open burning areas despite the fact that the sampling plan was not approved by EPA or DHS.
February 4, 1987	DHS letter to EPA enforcement with comments on Bermite's closure confirmation sampling deficiencies at 317 impoundment submitted 8/19/86.

February 10, 1987	DHS sends NOD on 8/1/86 closure plan (other regulated units besides impoundments) to Bermite's consultant .
February 18, 1987	Site visit by DHS and RWQCB.
March 3, 1987	Letter from EPA to Bermite noting above deficiencies and requiring revised closure plan including soil characterization and hydrogeologic assessment of former surface impoundment sites and groundwater monitoring.
May 6, 1987	DHS receives revised closure plan including workplan for characterization and hydrogeologic assessment at 317 and 342 sites.
June, 1987	DHS and EPA decide to modify Bermite's revised closure plan. Approval targeted for 9/30/87.
June/July, 1987	Bermite begins executing above workplan at their risk, without workplan approval by DHS or EPA.
July 16, 1987	RCRA Facility Assessment Visual Site Inspection by DHS, EPA, RWQCB, and EPA's RFA contactor.
August 4, 1987	CEQA notice of exemption drafted.
August 7, 1987	Public notice of closure plan and public hearing published in Newhall Signal. Public notice period begins.  Informational site visit by DHS SCS FPU, SMU geologist, and soil chemist from HQ tech. services environmental assessment unit.
September 10, 1987	Public hearing on closure plan held at local college. Public comment period closes.

## NOTICE OF DEFICIENCIES

### WHITTAKER-BERMITE GENERAL CLOSURE PLAN

1. In order to evaluate the adequacy of the closure plan for each specific hazardous waste management unit, the section of the plan for that unit should provide a clear explanation of the activities of the unit including its history, the specific chemicals handled there and their characteristics such as solubility in solvents such as steam, water, or organic solvents.
2. The size and other physical characteristics of each particular unit should be discussed.
3. Washwaters generated in the decontamination of hazardous wastes are themselves hazardous wastes and must be managed as such.
4. For each waste management unit, the closure plan must specify criteria to be used to determine when decontamination is complete. This should include a sampling plan specifying a minimum number of samples, the type of samples, and the specific chemical analysis to be used.
5. No details were given as to how the closure cost estimates were arrived at. The closure plan must be sufficiently detailed so that a fairly accurate closure cost estimate may be calculated. The facility must provide financial assurance for closure and post-closure, if necessary.
6. A post-closure plan, groundwater monitoring and deed restriction will be required for any waste management unit which involves the disposal of hazardous waste or hazardous waste residues in the ground.

# RECORD OF COMMUNICATION

☒ PHONE CALL    ☐ DISCUSSION    ☐ FIELD TRIP    ☐ CONFERENCE  
☐ OTHER (SPECIFY)

(Record of item checked above)

TO: Alan Sorsher  
DHS - SCS (213) 620-2380

FROM: Deborah Robinson  
T-2-2

DATE 2/9/87

TIME 1:30pm

SUBJECT Whittaker Bernite  
closure plan NOD

CAD 064573108

## SUMMARY OF COMMUNICATION

DHS sent a draft closure plan NOD to EPA for the TCBD area (no known land disposal units). The letter transmitting the draft NOD is dated 2/4/87, + requests EPA approval. A separate closure plan is being prepared for the surface impoundment.

I told Alan that EPA would not invest a lot of effort in the TCBD area closure because it does not contain known land disposal units. I said that the NOD was fine + suggested two minor changes:

- 1) Specify that the plan addresses only the TCBD area
- 2) Include the facility's EPA ID # in correspondence.

## CONCLUSIONS, ACTION TAKEN OR REQUIRED

This serves as a record of EPA's comments on the draft NOD.

## INFORMATION COPIES

TO: Wong, file, Sorsher, Britlow

State of California

Department of Health Services *jac. fite***Memorandum**

page 1 of 2

To : Alan Sorcher  
SCSDate : 9/21/87Subject: Results of Review  
and Evaluation of Finan-  
cial Assurance and Lia-  
bility DocumentsFrom : Joy Antell Phone 8-454-2976  
Financial Responsibility Unit  
1219 K Street, 2nd FloorWhittaker Corp. - Bermit CAD064573108  
(Facility) (EPA ID #)  
1231 S. Lincoln St., Colton, CA 92324  
(Address)

As requested, the financial assurance and liability documents for the above-named facility have been reviewed and evaluated. The results of this evaluation are good for 120 days from the date of this memo and are as follows:

Financial Assurance for Closure/Post-Closure\* Type of document: Purposed Corp. Guarantees Pending Closure/Post. C.  
Dollar amount provided: \$                      /                       
(Closure) (Post-Closure) *estimates*Results of evaluation: Pass ✓ Fail        (See comments)Liability Coverage\* Type of document: Purposed Corp. Guarantees Pending Closure/Post. Closure  
Dollar amounts: \$ 1 million / 2 million SUDDEN *estimates*  
(Per Occurrence) (Aggregate)  
\$ 3 million / 6 million NON-SUDDEN  
(Per Occurrence) (Aggregate)Results of evaluation: Pass ✓ Fail        (See comments)\* COMMENTS See attached Permit Conditions. Regarding  
financial assurance + liability under Art. 17 CAC.

APPENDIX E

NOTICE OF EXEMPTION

TO: X Office of Planning and Research  
1400 Tenth Street  
Sacramento, CA 95814

FROM: Department of Health Services  
Toxic Substances Control Division  
107 South Broadway, Room 7011  
Los Angeles, CA 90012

County Clerk  
County of \_\_\_\_\_

Closure Plan for Hazardous Waste Management Units, Whittaker - Bermite Corp.  
Project Title  
22116 Soledad Canyon Road  
Project Location - Specific

22116 Soledad Canyon Road  
Los Angeles  
Project Location - City  
Project Location - County  
SEE ATTACHMENT

Description of Nature, Purpose, and Beneficiaries of Project

California Department of Health Services,  
Toxic Substances Control Division  
Southern California Section  
107 South Broadway, Room 7011  
Los Angeles, CA 90012

Name of Public Agency Approving Project  
Whittaker Corporation, Bermite Division

Name of Person or Agency Carrying Out Project

Exempt Status: (Check One)

- ☐ Ministerial (Sec. 21080(b)(1); 15268);  
☐ Declared Emergency (Sec. 21080(b)(3); 15269(a));  
☐ Emergency Project (Sec. 21080(b)(4); 15269(b)(c)).  
☒ CATEGORICAL EXEMPTION, SEE ATTACHMENT

Reasons why project is exempt:

See Attachment

Contact Person  
Alan Sorsher  
Area Code/Telephone/Extension  
213/ 620/ 2380

If filed by applicant:

1. Attach certified document of exemption finding.
2. Has a notice of exemption been filed by the public agency approving the project? Yes ☐ No ☐

Date Received for Filing: \_\_\_\_\_

Signature

Title

*Supervising Waste Mgt. Engineer*

Revised March 1986

ATTACHMENT TO CEQA NOTICE OF EXEMPTIONProject Purpose:

As required by State and Federal laws, Whittaker Corporation, Bermite Division, (Bermite) has submitted a closure plan which describes steps to be taken by Bermite to remove or decontaminate the hazardous waste management units at the Saugus facility and verify that decontamination is complete.

In general, the closure performance standard states the the owner or operator must close his facility in a manner that:

- (a) Minimizes the need for further maintenance, and
- (b) Controls, minimizes or eliminates, to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous waste constituents, leachate, contaminated rainfall, or waste decomposition products to the ground or surface waters or to the atmosphere.

The purpose of the project is to meet the closure performance standard.

Nature of Project:

The following hazardous waste management units are addressed in Bermite's closure plan required by Title 40, Code of Federal Regulation, and Title 22, California Administrative Code:

- Six portable magazines used for storage of containers holding dry rocket propellant and propellant wastes.
- Two buildings used to store fiber drums containing bags holding dry paper and gloves contaminated with explosive wastes and ammo cans containing off-specification flare mix, powder, and rocket propellant.
- A system of small above-ground tanks used for stabilizing wash water containing lead azide.
- Two former surface impoundments, one 50ft. by 50 ft. held solvent wastes, and the other 30ft. by 60 ft. held water containing stabilized phosphorous.
- Thermal treatment areas where open burning of waste explosives and contaminated paper and gloves occurred. These areas include the former burn cage area, the former pans and rails area, two former burn pits, and the "East Fork" detonation range where waste explosives were remotely detonated.



ATTACHMENT TO CEQA NOTICE OF EXEMPTION

All the wastes have been removed from the portable magazines, the storage buildings and the tank treatment area. It is expected that closure activities for these units will primarily focus on sampling to verify that the units are not contaminated. If they are found to be uncontaminated they may be sold to another explosives manufacturer, demolished, removed or otherwise managed as non-hazardous waste.

The two impoundments were emptied of waste and disposed of at a hazardous waste disposal facility in 1983. An exploratory boring program performed by Bermite earlier this year indicates ~~that~~ some relatively minor leakage of solvents from one of the units. This is a common occurrence when closing surface impoundments. The closure plan activities will involve further study to confirm the extent of the leakage and to mitigate it, so that the closure performance standard will be met.

A similar investigation will be performed at the former open burning areas to determine if contamination is present there. If necessary, appropriate mitigation measures will be taken at these units also.

Although some mitigation measures will be necessary to meet the closure performance standard as discussed above, based upon the information currently available, it should not be construed that the site is heavily contaminated or that it presents a major threat to public health or the environment.

It should also be clear that the current project under consideration is only the formal closure of the hazardous waste management units. Future development or uses of the land may be the subject of a separate action under CEQA.

Beneficiaries of the project:

Bermite has ceased all operations at the entire 1100 acre facility and intends to sell the property. A certified closure under the various hazardous waste laws would probably increase the desirability of the property. We understand that the property will then be developed for residential and commercial purposes. The beneficiaries of the project would therefore be Bermite, the future owners and developers of the property and the general public by means of jobs, homes and an increased tax base.

Reasons why the project is exempt:

1. Based upon the information currently available, i.e. the types, quantities and concentrations of waste residues, Department foresees no reason why the closure activities at the site will have a significant effect on the environment.

ATTACHMENT TO CEQA NOTICE OF EXEMPTION

2. Section 15307 of the CEQA guidelines provides a categorical exemption for "actions taken by regulatory agencies as authorized by state law or local ordinance to assure the maintenance, restoration, or enhancement of a natural resource where the regulatory process involves procedures for protection of the environment."

Section 15308 of the CEQA guidelines provides a categorical exemption for "actions taken by regulatory agencies as authorized by state law or local ordinance to assure the maintenance, restoration, enhancement or protection of the environment where the regulatory process involves procedures for protection of the environment."

The Department considers that the approval of the closure plan involving the removal or other mitigation of any residual contamination that may be on the site can only enhance and protect natural resources such as surface and ground water, air and soil and the general environment.